

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

SHENNACO HOLDINGS, LLC, §
§
Plaintiff, §
§
v. § Civil Action No. 4:18-cv-00072-O
§
MITCHELL CHAD BARRETT, §
§
Defendant. §
§

DEFENDANTS' WITNESS LIST

Pursuant to the Scheduling Order entered by the Court on May 9, 2018 (Doc. 15), Defendant Mitchell Chad Barrett files the following Witness List. In addition to the witnesses listed below, Mr. Barrett reserves the right to call any witness called by Plaintiff and to call rebuttal witnesses if necessary.

I. Probable Witnesses

Mitchell Chad Barrett
c/o Barnes & Thornburg LLP
Robert M. Castle, II
Jamie R. Welton
Lucas C. Wohlford
2121 North Pearl Street, Suite 700
Dallas, Texas 75201

Mr. Barrett will testify regarding the Confidential Settlement and Mutual Release Agreement (the “Agreement”) which forms the basis of Plaintiff’s claims, Mr. Barrett’s intent in entering into the Agreement, the events and circumstances giving rise to the Agreement, and other matters related to Plaintiff’s claims and Mr. Barrett’s defenses. Mr. Barrett has been deposed and the expected duration of his direct examination is 1 hour.

SUBJECT MATTER OF TESTIMONY	SWORN	TESTIFIED
Mr. Barrett will testify regarding the Agreement, his intent in entering into the Agreement, the events and circumstances giving rise to the Agreement, and other		

matters related to Plaintiff's claims and Mr. Barrett's defenses.		
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David Alan Meeker
 c/o Perkins Coie, LLP
 Mark L. Johansen
 E. Steve Smith
 500 N. Akard Street, Suite 3300
 Dallas, Texas 75201

Mr. Meeker is expected to testify regarding the Agreement, Plaintiff's intent in entering into the Agreement, the events and circumstances giving rise to the Agreement, and other matters related to Plaintiff's claims. Mr. Meeker was deposed in this case in his capacity as Plaintiff's corporate representative and the expected duration of his examination is 1.5 hours.

SUBJECT MATTER OF TESTIMONY	SWORN	TESTIFIED
Mr. Meeker is expected to testify regarding the Agreement, Plaintiff's intent in entering into the Agreement, the events and circumstances giving rise to the Agreement, and other matters related to Plaintiff's claims.		

II. Possible Witnesses

Ric Speights
 630 W. Prien Lake Road
 Lake Charles, LA 70106

Mr. Speights may testify regarding the relationship of the parties prior to the entry of the Agreement and the facts and circumstances that led to the execution of the Agreement.

SUBJECT MATTER OF TESTIMONY	SWORN	TESTIFIED
Mr. Speights may testify regarding the relationship of the parties prior to the entry of the Agreement and the facts and circumstances that led to the execution of the Agreement.		

III. Experts

None.

IV. Record Custodians

None.

Respectfully submitted,

/s/ Lucas C. Wohlford
Robert M. Castle, III.
Rob.castle@btlaw.com
State Bar No. 24036338
Jamie R. Welton
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State Bar No. 24013732
Lucas C. Wohlford
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State Bar No. 24070871
BARNES & THORNBURG LLP
2121 North Pearl Street, Suite 700
Dallas, Texas 75201
Phone: 214-258-4149
Facsimile: 214-258-4199

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2019, a true and correct copy of the above and foregoing was electronically filed and served on all counsel of record via the Court's CM/ECF system.

/s/ Lucas C. Wohlford
Lucas C. Wohlford